Mark Highbaugh
Dana Corporation
400 South Miller Avenue
Marion, IN 46952-1137

Re: Registered Construction and Operation Status,
053-12540-00023

Dear Mr. Highbaugh:

The application from Dana Corporation received on July 25, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following source, to be located at 400 South Miller Avenue, Marion, Indiana, is classified as registered:

(a) Five (5) natural gas AMU comfort heating units with heat input rate of 7.15 million Btu/hour each, exhausting to the atmosphere;

(b) Eleven (11) natural gas ARU comfort heating units with heat input rate of 0.35 million Btu/hour each, exhausting to the atmosphere;

(c) One (1) natural gas ARU comfort heating units with heat input rate of 0.4 million Btu/hour, exhausting to the atmosphere;

(d) One (1) natural gas ARU comfort heating units with heat input rate of 3.125 million Btu/hour, exhausting to the atmosphere;

(e) Five (5) natural gas ARU comfort heating units with heat input rate of 1.25 million Btu/hour each, exhausting to the atmosphere;

(f) One (1) non-production natural gas heat treat furnance with heat input rate of 0.65 million Btu/hour, exhausting to the atmosphere;

(g) One (1) non-production natural gas hot water parts washer with a heat input rate of 0.24 million Btu/hour, exhausting to the atmosphere; and

(h) One (1) natural gas water evaporator with a heat input rate of 1 million Btu/hour, exhausting to the atmosphere.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minute (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This registration combines several previous registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

ERG/RB

cc: File - Grant County
Grant County Health Department
Air Compliance - Jim Thorpe
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	**Dana Corporation**
Address:	**400 S. Miller Avenue**
City:	**Marion, Indiana**
Authorized individual:	**Mark Highbaugh**
Phone #:	**(765) 664-1281**
Registration #:	**053-12540-00023**

I hereby certify that Dana Corporation is still in operation and is in compliance with the requirements of Registration 053-12540-00023.

Name (typed):	
Title:	
Signature:	
Date:	

Indiana Department of Environmental Management (IDEM)
Office of Air Management

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	**Dana Corporation**
Source Location:	**400 S. Miller Avenue, Marion, Indiana 46952**
County:	**Grant**
Construction Permit No.:	**053-12540-00023**
SIC Code:	**3714**
Permit Reviewer:	**ERG/RB**

The Office of Air Management (OAM) has reviewed an application from Dana Corporation relating to the construction and operation of an automobile parts manufacturing facility:

Permitted Emission Units

The source consists of the following emission units:

(a) Five (5) natural gas AMU comfort heating units with heat input rate of 7.15 million Btu/hour each, exhausting to the atmosphere;

(b) Eleven (11) natural gas ARU comfort heating units with heat input rate of 0.35 million Btu/hour each, exhausting to the atmosphere;

(c) One (1) natural gas ARU comfort heating units with heat input rate of 0.4 million Btu/hour, exhausting to the atmosphere;

(d) One (1) natural gas ARU comfort heating units with heat input rate of 3.125 million Btu/hour, exhausting to the atmosphere;

(e) Five (5) natural gas ARU comfort heating units with heat input rate of 1.25 million Btu/hour each, exhausting to the atmosphere;

(f) One (1) non-production natural gas heat treat furnance with heat input rate of 0.65 million Btu/hour, exhausting to the atmosphere;

(g) One (1) non-production natural gas hot water parts washer with a heat input rate of 0.24 million Btu/hour, exhausting to the atmosphere; and

(h) One (1) natural gas water evaporator with a heat input rate of 1 million Btu/hour, exhausting to the atmosphere.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 053-383, issued on August 3, 1994;

(b) CP 053-5095, issued on January 2, 1996.

(c) CP 053-9233, issued on December 22, 1997.

All conditions from previous approvals were incorporated into this permit except the following:

(a) 27-01-85-0152 issued on March 13, 1981

Coal-fired boilers, no longer operational

(b) 27-01-85-0153, issued on March 13, 1981

Coal-fired boilers, no longer operational

(c) 27-01-85-0154, issued on March 13, 1981

Coal-fired boilers, no longer operational

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 25, 2000, with additional information received on August 2000.

Emissions Calculations

See Appendix A of this document for detailed emission calculations (2 pages).

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	1.71
PM-10	1.71
SO_2	0.13
VOC	1.24
CO	18.86
NO_x	22.48

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs are less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Grant County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Grant County has been designated as attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Grant County has been classified as attainment for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.71
PM10	1.71
SO_2	0.13
VOC	1.24
CO	18.82
NO_x	22.45

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) This emissions were based on calculation provided in Appendix A.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the enissions from this permit CP-053-12540-00023, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Grant County and the potential to emit of each criteria pollutant is less then 100 tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Conclusion

The operation of this auto parts manufacturing facility shall be subject to the conditions of the attached proposed Registration No. CP-053-12540-00023.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Natural Gas Furnaces

Company Na: **Dana Corporation**
Address City **400 South Miller Ave, Marion, IN 46952-1137**
Reg: **-12487**
Plt ID: **23**
Reviewer: **ERG/RB**
Date: **08/23/00**

Heat Input Capacity (per furnace) MMBtu/hr	Number of Furnaces	Potential Throughput (per furnace) MMCF/yr
7.15	5	313.2
0.35	11	33.7
0.40	1	3.5
3.13	1	27.4
1.25	5	54.8
0.65	1	5.7
0.24	1	2.1
1.00	1	8.8
Total	26	449.0814

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.7065	1.7065	0.1347	22.4541	1.2350	18.8614

*PM and PM10 emission factors are combined fitlerable and condensable PM and PM10, respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
above
emission

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Natural Gas Furnaces

Company Nai **Dana Corporation**
Address City **400 South Miller Ave, Marion, IN 46952-1137**
Reg: **-12487**
Plt ID: **23**
Reviewer: **ERG/RB**
Date: **08/23/00**
Date: **08/04/00**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.02	0.40	0.00

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr (per furi	0.00	0.00	0.00	0.00	0.00

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.